

Adam R. Pechtel / WSBA #43743  
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Attorney for Defendant

United States District Court  
Eastern District of Washington  
Before the Hon. Salvador Mendoza, Jr.

United States of America,

Plaintiff,

v.

Monica Pesina,

Defendant.

No. 4:19-CR-06063-SMJ-1

Motion to Continue Pretrial,  
Trial and Extend Deadline to  
File Pretrial Motions

Without oral argument  
July 31, 2020 at 6:00 PM

Ms. Pesina, through her attorney of record, moves the Court to continue the pretrial conference date currently set for August 27, 2020 to November 12, 2020 and the trial date that is currently set for September 28 to December 7, 2020 at 9:00 AM. Ms. Pesina's attorney contacted AUSA Stephanie A. Van Marter and counsel

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for the co-defendant, Nick Marchi, and they both do not object to continuing the pretrial conference and trial date.

The reason for this request is that Defendant Pesina is attempting to retain private counsel. If she is successful, her new counsel will need additional time to review discovery, investigate her defense, prepare pretrial motions and prepare for trial. Pesina believes a continuance is necessary and acknowledges that any continuance would constitute excludable time under the Speedy Trial Act. Ms. Pesina has signed a statement of reasons in support of her request for a continuance, which will be filed with the Court.

Defendant Pesina proposed the following case management deadlines. Her counsel contacted opposing counsel and counsel for co-defendant but has not heard back from them prior to filing this motion.

All pretrial motions, including discovery motions, <i>Daubert</i> motions, and motions <i>in limine</i> , filed	<b>October 8, 2020</b>
<b>PRETRIAL CONFERENCE</b> <b><i>Deadline for motions to continue trial</i></b>	<b>Thursday, November 12, 2020</b> <b>RICHLAND</b>
CIs' identities and willingness to be interviewed disclosed to Defendant (if applicable)	<b>November 23, 2020</b>

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Grand jury transcripts produced to Defendant	
Case Agent:	<b>November 23, 2020</b>
CIs:	<b>November 23, 2020</b>
Other Witnesses:	<b>November 23, 2020</b>
Exhibit lists filed and emailed to the Court	<b>November 30, 2020</b>
Witness lists filed and emailed to the Court	<b>November 30, 2020</b>
Trial briefs, jury instructions, verdict forms, and requested voir dire filed and emailed to the Court	<b>November 25, 2020</b>
Exhibit binders delivered to all parties and to the Court	<b>November 25, 2020</b>
Delivery of JERS-compatible digital evidence files to the Courtroom Deputy	<b>November 25, 2020</b>
Trial notices filed with the Court	<b>November 25, 2020</b>
Technology readiness meeting (in-person)	<b>November 30, 2020</b>
<b>JURY TRIAL</b>	<b>Monday, December 7, 2020 9:00 AM - Richland</b>

Dated: July 17, 2020

Respectfully Submitted,

s/Adam R. Pechtel

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SERVICE CERTIFICATE

I certify that July 17, 2020, I electronically filed the foregoing with the District Court Clerk using the CM/ECF System, which will send notification of such filing to the following:

Stephanie A. Van Marter, Assistant United States Attorney

Nicholas W. Marchi, Attorney for Nicholas S. Carter, Co-Defendant.

s/Adam R. Pechtel

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